IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF INDIANA INDIANAPOLIS DIVISION

STAVANGER HOLDINGS, LTD and KARL ANDERSEN,)))
Plaintiffs,)
VS.) Civil Action No.: 12 - 00646 (WTL)(DKL)
TRANEN CAPITAL, LTD, TRANEN CAPITAL ALTERNATIVE INVESTMENT FUND, LTD., THE LEO GROUP, LLC, KENNETH A. LANDGAARD, and ARTHUR L. BOWEN,))))
Defendants.	,))

PLAINTIFFS' MOTION FOR A TELEPHONIC CONFERENCE

A Confidential Settlement Agreement (the "Agreement") was entered into between Plaintiffs and the Tranen Defendants (or "Tranen") just a few weeks ago. As set forth in Plaintiffs' currently pending motion (ECF 107-109), Tranen is in material breach of the Agreement. Simply put, Tranen, acting through its sole remaining director, Mr. Kenneth Landgaard, appears to have no intention of complying with the clear and express terms of the Agreement. ¹

Moreover, Tranen has offered absolutely no explanation for its conduct since executing the Agreement and, through its inaction, threatens to eviscerate the very purpose and value of the Agreement. Since Tranen is not currently represented by counsel, it may not fully understand or appreciate the consequences of not complying with the Agreement.

¹ The terms of the Agreement and the nature of the breach are set forth in detail in Plaintiffs' previous motion (ECF 107-109).

Therefore, Plaintiffs believe that a telephone conference between the parties and the Court is necessary to implement the terms of the Agreement and to avoid reigniting this litigation. Time is of the essence in this matter and the Court's scheduling of a conference call at its earliest convenience would be greatly appreciated.

Dated: December 9, 2013 Indianapolis, IN

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CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of December 2013, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all of the parties who have subscribed to the Court's electronic filing system. Parties may access this filing through the Court's system.

s/Ryan M. Hurley
Ryan M. Hurley